

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 GLORIA A. BARRIOS  
Supervising Deputy Attorney General  
3 LINDA L. SUN, State Bar No. 207108  
California Department of Justice  
4 300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
5 Telephone: (213) 897-6375  
Facsimile: (213) 897-2804  
6 Attorneys for Complainant

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **FELIX BROWN**  
223 West 52<sup>nd</sup> Place  
Los Angeles, California 90037  
14 Registered Nurse License No. 292969  
15 Respondent.

Case No. 2010-226

**ACCUSATION**

18 Louise R. Bailey, M.Ed., RN ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Interim  
21 Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer  
22 Affairs.

23 2. On or about August 31, 1978, the Board issued Registered Nurse License Number  
24 292969 to Felix Brown ("Respondent"). The license was in full force and effect at all times  
25 relevant to the charges brought herein. The license expired on February 28, 2006, and has not  
26 been renewed.

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1 **CAUSE FOR DISCIPLINE**

2 **(Gross Negligence)**

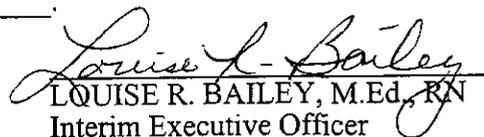
3 11. Respondent is subject to discipline under Code section 2761, subdivision (a)(1),  
4 as defined under California Code of Regulations, title 16, section 1442, in that on or about  
5 March 24, 2005, while on duty as a Charge Nurse in the CCU at King/Drew, Respondent was  
6 grossly negligent by allowing Andrade to take an unauthorized break, allowing Andrade to sleep  
7 on duty on prior occasions, and leaving the unit inadequately staffed and supervised.  
8 Complainant refers to and incorporates all the allegations contained in paragraphs 8 - 10, as  
9 though set forth fully.

10 **PRAYER**

11 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein  
12 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 13 1. Revoking or suspending Registered Nurse License Number 292969, issued to  
14 Felix Brown;
- 15 2. Ordering Felix Brown to pay the Board of Registered Nursing the reasonable  
16 costs of the investigation and enforcement of this case, pursuant to Business and Professions  
17 Code section 125.3; and,
- 18 3. Taking such other and further action as deemed necessary and proper.

19 DATED: 10/22/09

20   
21 LOUISE R. BAILEY, M.Ed., RN  
22 Interim Executive Officer  
23 Board of Registered Nursing  
24 Department of Consumer Affairs  
25 State of California  
26 Complainant

27 LA2009602300  
28 Accusation.(kdg)7/21/09